

EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION MDL No. 2804
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan
Aaron Polster

The County of Cuyahoga v. Purdue
Pharma, L.P., et al.
Case No. 17-OP-45005
City of Cleveland, Ohio vs. Purdue
Pharma, L.P., et al.
Case No. 18-OP-45132
The County of Summit, Ohio,
et al. v. Purdue Pharma, L.P.,
et al.
Case No. 18-OP-45090

Videotaped Deposition of Joseph Rannazzisi
Washington, D.C.
April 26, 2019
8:37 a.m.

Reported by: Bonnie L. Russo
Job No. 3301876

1 counsel. And the agency made a decision that
2 ARCOS data was not -- was business proprietary
3 and was not going to be released in that
4 manner.

5 BY MR. EPPICH:

6 Q. Would you give registrants any more
7 information or guidance about suspicious order
8 monitoring programs and suspicious orders?

9 MR. BENNETT: Objection.
10 Speculation. Objection. Incomplete
11 hypothetical.

12 MR. UTTER: Go ahead.

13 MR. BENNETT: And objection. Scope.
14 Sorry.

15 THE WITNESS: I think that the
16 suspicious order monitoring regulation
17 1301.74(b) was -- the definition of suspicious
18 order is very straightforward.

19 I don't know what other information
20 I could provide to them to clarify what a
21 suspicious orders is without making a business
22 decision for them, which the regulations would
23 not allow me to do.

24 BY MR. EPPICH:

25 Q. Would you change the regulations --

1 MS. SINGER: Objection.

2 BY MR. EPPICH:

3 Q. -- if you were to go back?

4 MS. SINGER: Objection. Scope.

5 MR. BENNETT: Object --

6 THE WITNESS: I --

7 MR. BENNETT: Hold on.

8 Objection. Scope. Objection.

9 Calls for speculation. Objection. Incomplete
10 hypothetical.

11 I will also instruct the witness
12 that, to the extent there were internal
13 deliberations that were not made public by the
14 DEA during your time there, you are not
15 authorized to disclose those internal
16 deliberations.

17 MR. UTTER: Same objection.

18 Go ahead.

19 THE WITNESS: The problem is -- is
20 the regulation change was not under my
21 authority. The regulation change would be
22 under the authority of the administrator of the
23 Drug Enforcement Administration and Department
24 of Justice.

25 That's -- so whether I make that

1 decision or not, the final decision is the
2 Department of Justice and the Drug Enforcement
3 Administration leadership. So I -- I couldn't
4 answer that.

5 BY MR. EPPICH:

6 Q. And you have no role in that
7 process? You can't suggests a change?

8 MS. SINGER: Objection. Scope.

9 MR. BENNETT: Objection. Scope.

10 You are not authorized to disclose
11 internal deliberative process of the agency.
12 To the extent you can answer without disclosing
13 the internal deliberative process of the
14 agency, you may answer.

15 THE WITNESS: I can't -- I can't
16 answer that question.

17 BY MR. EPPICH:

18 Q. You've been criticized for your
19 actions by head of Office of Diversion Control.

20 MR. BENNETT: Objection.

21 BY MR. EPPICH:

22 Q. That's true, correct?

23 MS. SINGER: Objection. Vague.

24 MR. BENNETT: Objection. Vague.

25 THE WITNESS: Do you have any

1 on the record. This is the start of Media Unit
2 No. 2. The time is 9:37.

3 You may proceed, Counsel.

4 BY MR. EPPICH:

5 Q. Mr. Rannazzisi, earlier today you
6 testified that the suspicious order monitoring
7 regulation is straightforward; is that correct?

8 A. Yes, sir.

9 Q. In your opinion, was the -- no
10 update is needed to that statute or regulation,
11 correct?

12 MR. BENNETT: Objection.

13 MS. SINGER: Objection. Foundation.
14 Scope.

15 MR. BENNETT: Objection.

16 I will instruct the witness that you
17 are not authorized to disclose any internal
18 deliberations that you had within the agency.

19 To the extent you can answer that
20 question without disclosing internal
21 deliberations that you had in the agency, you
22 may answer.

23 THE WITNESS: I can't answer that
24 question, it's based on.

25 BY MR. EPPICH:

1 MR. UTTER: Same instruction not to
2 answer.

3 SPECIAL MASTER COHEN: I think you
4 need to answer that question yes or no.

5 MR. UTTER: Go ahead.

6 THE WITNESS: Yes.

7 BY MR. EPPICH:

8 Q. Which cases are you a paid
9 consultant for plaintiffs' lawyers in the
10 opioid litigation?

11 MR. UTTER: I instruct you not to
12 answer. Work product privilege, other cases
13 besides this one.

14 SPECIAL MASTER COHEN: That one I
15 don't think you need to.

16 BY MR. EPPICH:

17 Q. When did you start becoming a
18 consultant to plaintiffs' lawyers?

19 MS. SINGER: Objection. Scope.

20 MR. UTTER: Go ahead. You can
21 answer that.

22 THE WITNESS: Yeah. I am just
23 trying -- it was sometime I believe in --
24 sometime during 2016.

25 BY MR. EPPICH:

1 scope.

2 MR. UTTER: Same objection.

3 Go ahead.

4 THE WITNESS: I -- I can't answer
5 that. Because there's -- there's processes in
6 place to review and make a determination that
7 has other -- there's other components involved,
8 not just the Office of Diversion Control.

9 BY MR. O'CONNOR:

10 Q. Was there ever a time at DEA that
11 the DEA granted a procurement quota to a
12 manufacturer it knew was diverting products?

13 MR. BENNETT: Objection. Scope.

14 You're not authorized to disclose
15 information regarding any specific nonpublic
16 DEA investigations or activities.

17 To the extent that there's public
18 information that allows you to answer this
19 question, you may. But you may not disclose
20 any specific DEA investigations or activities
21 that are nonpublic.

22 THE WITNESS: I can't answer that
23 question.

24 BY MR. O'CONNOR:

25 Q. Mr. Rannazzisi, would you agree with